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19 UNITED STATES DISTRICT COURT  
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21 NORTHERN DISTRICT OF CALIFORNIA  
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23 SAN JOSE DIVISION  
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IN RE iPHONE/iPAD  
APPLICATION CONSUMER  
PRIVACY LITIGATION

Case No.: 5:11-MD-02250-LHK

**DECLARATION OF DEBORAH  
KRAVITZ IN SUPPORT OF  
PLAINTIFFS' SECOND MOTION  
FOR CLASS CERTIFICATION**

Date: October 31, 2013  
Time: 1:30 pm  
Courtroom: 8 – 4th Floor  
Judge – Hon. Lucy H. Koh

1 I, Deborah Kravitz, declare as follows:

2 1. I am senior counsel at KamberLaw, LLP, and a member of the bar of the  
3 States of California and Maryland and the District of Columbia, and am fully familiar  
4 with the proceedings in this matter.

5 2. I make this declaration in support of Plaintiffs' Second Motion for Class  
6 Certification and based on personal knowledge. I am competent to testify to the matters  
7 set forth here, and would testify to the matters as set forth here if called upon to do so.

8 3. Attached as Exhibit 1 is a true and correct copy of excerpts of the  
9 deposition of Cameron Dwyer dated August 14, 2012.

10 4. Attached as Exhibit 2 is a true and correct copy of the declaration of  
11 Cameron Dwyer dated August 16, 2013.

12 5. Attached as Exhibit 3 is a true and correct copy of the declaration of Dr.  
13 Lodovico Marziale and accompanying exhibits dated August 19, 2013.

14 6. Attached as Exhibit 4 is a true and correct copy of excerpts of the  
15 deposition of Anthony Chiu dated August 15, 2012.

16 7. Attached as Exhibit 5 is a true and correct copy of a letter from Bruce  
17 Sewell, General Counsel and Senior Vice President of Legal and Government Affairs,  
18 stamped APPLE\_1026895 through APPLE\_1026916, to the California Department of  
19 Justice dated May 4, 2011.

20 8. Attached as Exhibit 6 is a true and correct copy of documents stamped  
21 APPLE\_1029410 through APPLE\_1029411, which is an internal Apple email exchange.

22 9. Attached as Exhibit 7 is a true and correct copy of the declaration of Dr.  
23 Manuel Egele dated August 18, 2013.

24 10. Attached as Exhibit 8 is a true and correct copy of excerpts of the  
25 deposition of Ronald Huang, Senior Manager iOS and Location Services, dated  
26 December 5, 2012.

27 11. Attached as Exhibit 9 is a true and correct copy of documents stamped  
28 APPLE\_0003495 through APPLE\_0003497, which is an internal Apple report.

1           12.     Attached as Exhibit 10 is a true and correct copy of documents stamped  
2 APPLE\_1004683 through APPLE\_1004691, which is an email from M. Grainger dated  
3 April 27, 2011.

4           13.     Attached as Exhibit 11 is a true and correct copy of a document stamped  
5 APPLE\_1029834, which is an email from D. Remahl dated April 18, 2012.

6           14.     Attached as Exhibit 12 is a true and correct copy of a document stamped  
7 APPLE\_1027568, which is an email from R. Huang dated May 2, 2011.

8           15.     Attached as Exhibit 13 is a true and correct copy of a document stamped  
9 APPLE-R\_1032890 through APPLE-R\_1032891, which is an email exchange between S.  
10 Jobs and a customer dated April 21, 2011, through April 23, 2011.

11           16.     Attached as Exhibit 14 is a true and correct copy of documents stamped  
12 APPLE\_2549038 through APPLE\_2549038, which is an email from S. Jobs dated April  
13 21, 2011.

14           17.     Attached as Exhibit 15 is a true and correct copy of documents stamped  
15 APPLE\_1033009 through APPLE\_1033012, which is an internal Apple email exchange  
16 dated April 24, 2011, through April 25, 2011.

17           18.     Attached as Exhibit 16 is a true and correct copy of documents stamped  
18 APPLE\_1033090 through APPLE\_1033093, which is an internal Apple email exchange  
19 dated April 24, 2011, through April 25, 2011.

20           19.     Attached as Exhibit 17 is a true and correct copy of documents stamped  
21 APPLE\_1004291 to APPLE\_1004294, which is an email from S. Forstall dated April 25,  
22 2011.

23           20.     Attached as Exhibit 18 is a true and correct copy of documents stamped  
24 APPLE\_1133470 through APPLE\_1133475, which is an internal report dated February  
25 2013.

26           21.     Exhibit 19 has been intentionally left blank.

27           22.     Attached as Exhibit 20 is a true and correct copy of documents stamped  
28 APPLE\_1081145 through APPLE\_1081147, which is an internal Apple email exchange

1 including an email from S. Moseley dated March 9, 2011.

2 23. Attached as Exhibit 21 is a true and correct copy of documents stamped  
3 APPLE\_1111073 through APPLE\_1111075, which is a customer complaint submitted to  
4 Apple dated January 24, 2012.

5 24. Attached as Exhibit 22 is a true and correct copy of documents stamped  
6 APPLE\_2275042 through APPLE\_2275053, which is a report titled "Collaborative  
7 Energy Debugging for Mobile Devices."

8 25. Attached as Exhibit 23 is a true and correct copy of documents stamped  
9 APPLE-N\_1026764 through APPLE-N\_1026765, which is an email exchange between  
10 S. Moseley and P. Shoemaker dated October 20, 2011.

11 26. Attached as Exhibit 24 is a true and correct copy of documents stamped  
12 APPLE\_1032366 through APPLE\_1032369, which is an email from R. Huang dated  
13 December 14, 2009.

14 27. Attached as Exhibit 25 is a true and correct copy of documents stamped  
15 APPLE\_2504568 through APPLE\_2504571, which is an internal email exchange dated  
16 October 2011.

17 28. Attached as Exhibit 26 is a true and accurate copy of documents stamped  
18 APPLE\_1637009 through APPLE\_1637012, which is an internal email exchange dated  
19 August 22, 2012, through August 23, 2012.

20 29. Attached as Exhibit 27 is a true and accurate copy of documents stamped  
21 APPLE\_1138698 through APPLE\_1138699, which is an email from A. Ricci dated  
22 March 26, 2012.

23 30. Attached as Exhibit 28 is a true and correct copy of documents stamped  
24 APPLE\_0007933 through APPLE\_0007935, which is an email from P. Shoemaker to A.  
25 Schaffer dated March 26, 2012.

26 31. Attached as Exhibit 29 is a true and accurate copy of documents stamped  
27 APPLE\_2222930 through APPLE\_2222932, which is an email exchange between A.  
28 Guerrand and S. Moseley dated March 2, 2012.

1           32.     Attached as Exhibit 30 is a true and correct copy of documents stamped  
2 APPLE\_1029714 through APPLE\_1029745, which is a document by David Remahl  
3 dated July 12, 2011.

4           33.     Attached as Exhibit 31 is a true and correct copy of documents stamped  
5 APPLE\_2263803 through APPLE\_2263805, which is an internal email exchange dated  
6 August 23, 2011.

7           34.     Attached as Exhibit 32 is a true and correct copy of documents stamped  
8 APPLE\_2242617 through APPLE\_2242618, which is an email exchange between T.  
9 Neumayr and K. Knight dated October 11, 2012.

10          35.     Attached at Exhibit 33 is a true and correct copy of documents stamped  
11 APPLE\_1138840 through APPLE\_1138843, which is an internal email exchange dated  
12 March 21, 2012, through March 28, 2012.

13          36.     Attached as Exhibit 34 is a true and correct copy of documents stamped  
14 APPLE\_1029826 through APPLE\_1029827, which is an email from J. Schaffer dated  
15 April 4, 2012.

16          37.     Attached as Exhibit 35 is a true and correct copy of documents stamped  
17 APPLE\_1029823 through APPLE\_1029825, which is an email from C. Parker dated  
18 April 4, 2012.

19          38.     Attached as Exhibit 36 is a true and correct copy of documents stamped  
20 APPLE\_1006783 through APPLE\_1006785, which is a document by J. Hornthal dated  
21 2011.

22          39.     Attached as Exhibit 37 is a true and correct copy of documents stamped  
23 APPLE\_1029534 through APPLE\_1029535, which is an email exchange between S.  
24 Moseley and P. Shoemaker dated March 25, 2012.

25          40.     Attached as Exhibit 38 is a true and correct copy of documents stamped  
26 APPLE\_1079725, which is an email from P. Shoemaker dated April 19, 2012.

27           I declare under penalty of perjury under the laws of the United States of America  
28 that the foregoing is true and correct.

Executed on August 19, 2013, at Sonoma County, California.

By:

s/Deborah Kravitz

Deborah Kravitz

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